



WHITE HOUSE INITIATIVE ON ASIAN AMERICANS AND PACIFIC ISLANDERS DRAFT AGENCY PLAN

Department/Agency: U.S. Equal Employment Opportunity Commission (EEOC)

Program Goal 1: Improve data collection and analysis regarding Asian Americans and Pacific Islanders and other underserved populations.

Objective 1.1: Increase and improve data collection and further disaggregate by national origin. Currently, the EEOC only collects some AAPI race and national origin data about the individuals we serve.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Improve the data collected during the private sector intake and charge process by further disaggregating AAPI national origin categories.	Year 1	Office of Field Programs (202) 663-4900	a. Review the national origin data collected and assess whether new AAPI national origin categories should be added. b. Evaluate quality controls to ensure that the data is collected consistently and accurately during charge processing.
2. Improve the AAPI workforce data collected from employers by modifying the racial categories on the equal employment opportunities surveys (i.e. EEO-1, EEO-3, EEO-4, and EEO-5).	Years 1 – 3	Office of Research, Information, and Planning/Office of Legal Counsel (202) 663-4900	a. Revise EEO-1 to comport with OMB’s 1997 Revision to the Standards for the Classification of Federal Data on Race and Ethnicity (superseding OMB Directive 15) and disaggregate the “two or more races” category. Employers will be required to allow an employee to self-identify more than one race and specify which races, for example, allowing

			<p>individuals who are Asian and Pacific Islander to identify both of those races.</p> <p>b. Modify and update EEO-3, EEO-4, and EEO-5 to comply with OMB's 1997 Revision to the Standards for the Classification of Federal Data on Race and Ethnicity. These reports currently do not allow employers to report Asians and Pacific Islanders separately or to report whether employees are more than one race.</p>
3. Assess language/translation needs in the EEOC's mediation program.	Year 1 – Year 2	Office of Field Programs (202) 663-4900	<p>a. Require mediators to track whether Asian or Pacific Islander language translation services were requested or utilized by the parties during mediation.</p> <p>b. Generate a yearly report of the number of mediations by office in which 1) language translations services were requested, whether the services were provided and what languages were requested and 2) whether mediation participants provided their own translators and what languages were translated.</p> <p>c. After assessing translation needs in mediation, provide additional translation services in mediation as appropriate.</p>

Objective 1.2: Improve data analysis and dissemination of data regarding Asian Americans and Pacific Islanders and other underserved populations.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Improve analysis of AAPI workforce	Year 1	Office of Field	a. Examine AAPI charge data from FY2008 to

data and charge data.		Programs/Office of Research, Information, and Planning (202) 663-4900	<p>FY2010. Assess whether there is a disparity in charges filed by individuals of different AAPI national origins and the implications of these findings for EEOC's work.</p> <p>b. Examine Census data and AAPI workforce data trends to determine how to focus EEOC's outreach strategies in a way that will most effectively encourage AAPIs who have been discriminated against to file charges with the EEOC.</p>
2. Improve public access to information on AAPI workforce, charge/complaint, and litigation data.	Year 1 and annually	Office of Federal Operations/Office of Research, Information, and Planning/Office of the General Counsel (202) 663-4900	<p>a. Create AAPI "Fact Sheets." Separate sheets will be created annually, beginning in 2011, providing a demographic profile of the AAPI population and charges/complaints filed by AAPIs in the private sector (nationally and by district), state and local governments, and the federal government. The sheets will include a summary of relevant Census data and/or EEO1 data.</p> <p>b. Post the AAPI "fact sheets" on EEOC's public website and disseminate them to Federal government affinity groups, community-based organizations, and Fair Employment Practices Agencies.</p> <p>c. Develop a list of significant cases the EEOC has brought on behalf of AAPIs that is updated annually for distribution to staff with outreach responsibilities.</p>

Program Goal 2: Increase and improve the EEOC's communication with various AAPI communities to ensure that AAPIs can fully utilize the services of the EEOC, and the EEOC can meet the most important equal employment opportunity needs of AAPIs and other underserved populations.

Objective 2.1: Increase the number of outreach events that EEOC jointly sponsors with AAPI affinity and community organizations nationwide to specifically address discriminatory workplace practices affecting the AAPI community.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Devise performance measures for how well field offices reach out to their local AAPI communities.	Year 1	Office of Field Programs /Office of Human Resources/Office of the Chair (202) 663-4900	a. Develop criteria for evaluating how well offices conduct outreach to AAPIs in their jurisdiction. b. Make outreach to stakeholders, including AAPI communities, an element of performance plans.
2. Analyze the Census Bureau's annual American Community Survey data to identify major demographic changes as well as which AAPI ethnic groups are the largest in each District Office's jurisdiction.	Year 1	Office of Field Programs (202) 663-4900	a. Obtain most recent Census data, such as the three-year average American Community Survey, on AAPIs in a particular jurisdiction. b. Analyze the demographic data to determine which AAPI ethnic groups are the most prevalent in each District Office's particular jurisdictional area. c. Analyze the data to identify significant demographic changes in the jurisdiction's population.
3. Partner with community groups that can introduce the EEOC to AAPIs groups in the jurisdiction, especially underserved AAPIs and AAPIs from the largest ethnic groups as determined by the above-discussed data analysis	Year 1	Office of Field Programs/Program Analysts for each EEOC Field Office (202) 663-4900	a. Identify AAPI community organizations, or cultural events that have strong ties to the largest AAPI ethnic populations and underserved AAPIs in the jurisdiction. b. Field offices develop relationships and form partnerships with these groups.

			<p>c. Consistently attend AAPI community events each year to build trust and visibility within the community and continue to expand the number of partnerships with AAPI community organizations.</p> <p>d. Develop opportunities for cross-training with the community organizations so that EEOC employees can receive local training about working with the AAPI communities and issues in their jurisdictions.</p>
4. Conduct outreach to small Asian-owned businesses to inform them about the employment discrimination laws enforced by the EEOC.	Year 1 and annually	Office of Field Programs/Program Analysts for each EEOC Field Office (202) 663-4900	<p>a. Office of Field Programs coordinates with field offices to identify individual businesses and AAPI business organizations such as local Asian Chambers of Commerce.</p> <p>b. Conduct 30 outreach events nationwide to AAPI small businesses and organizations to provide information about their responsibilities under the laws enforced by the EEOC.</p>
5. Conduct outreach to businesses that employ large numbers of AAPIs.	Year 1	Office of Field Programs/Program Analysts for each EEOC Field Office (202) 663-4900	<p>a. Identify businesses with a large number of AAPI employees and organizations that may serve these businesses and/or employees such as an AAPI professional organization.</p> <p>b. Conduct outreach to these businesses and organizations to inform them about the employment discrimination issues that AAPIs face and how to prevent employment discrimination in their workplace.</p>
6. Increase number of contacts made to Asian and PI ethnic media by 50%	Year 1	Office of Communications and Legislative Affairs/ Office of Field	<p>a. Increase the number of press releases sent to Asian and PI ethnic media and the number of radio and television appearances/coverage in the Asian and Pacific Islander community made by 50%.</p>

		Programs/Program Analysts for each EEOC Field Office (202) 663-4900	
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Objective 2.2: Improve the EEOC's ability to communicate with AAPIs and other groups who communicate primarily in a language other than English by increasing access to linguistically appropriate resources and improving the language capability of the EEOC workforce.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Confer with the Department of Justice Coordination and Review Section to evaluate status of agency plan related to Executive Order 13166	Years 1-2	Office of Legal Counsel/Office of the Chair (202) 663-4900	a. Complete plan. b. Post plan for public viewing. c. Make information available in appropriate languages to populations with Limited English Proficiency in compliance with Executive Order 13166.
2. Hire more bilingual staff based on language needs of each field office.	Years 1-2	Field Offices /Office of Human Resources/Office of the Chair (202) 663-4900	a. Within six months assess current language of staff in regional offices and headquarters who serve the public. b. Using the latest census data and other relevant available data for a field office's particular jurisdiction, identify the primary languages that are the most common for individuals who state that English is not their first language. c. After assessing the needs of each regional office and headquarters, increase the number of bilingual positions/vacancy announcements.

			d. Hire staff members to fill all current bilingual vacancies as well as any newly created positions/vacancies.
3. Retain bilingual staff.	Years 1-2	Field Offices /Office of Human Resources (202) 663-4900	a. Determine whether bilingual staff members separate at a faster rate than other employees. If so, conduct more in-depth exit interviews to determine the reasons for leaving and implement policies to increase retention of bilingual staff members. b. Assess success of policy by examining changes in the separation rate of bilingual employees. c. Communicate to managers the importance of retaining qualified bilingual staff members.
4. Explore how the EEOC can better share bilingual staff across offices.	Years 1-2	Office of Field Programs/Office of the Chair (202) 663-4900	a. Develop and implement a pilot program for sharing bilingual staff across offices. b. Develop and implement a plan so that the Commission can rapidly deploy teams of bilingual employees, when necessary, to regions suffering from major events or disasters that affect equal employment such as Hurricane Katrina and the Gulf Oil Spill.
5. Increase by 50% the number of EEOC materials translated into AAPI languages.	Years 1-2	Office of Communications and Legislative Affairs/ Office of Research Information and Planning/Office of Field Programs/ Office of Information Technology	a. Delete the link on EEOC's homepage labeled "other languages" and replace with links in the actual foreign languages that we have translated materials for. b. Identify what are the most important documents that the AAPI community needs to have translated by surveying field offices and consulting with AAPI community groups.

		(202) 663-4900	<p>c. Increase by 50% the number of EEOC documents translated into Asian or Pacific Islander languages and utilize the revised agency LEP plan to update the list of Asian or Pacific Islander languages used in translations.</p> <p>d. Review previously translated documents to ensure they are culturally and linguistically appropriate and conform with current laws and EEOC practices.</p> <p>e. Explore alternate, more economical ways of producing initial drafts of translated documents other than hiring professional translators or bilingual staff, such as using off-the-shelf computer programs and crowdsource translating.</p> <p>f. Create an online inventory of all foreign language documents at headquarters and field offices.</p> <p>g. Post all translated documents on EEOC's internal and external websites and make copies of all translated documents available through the publications center.</p>
6. Increase the number of foreign language audio recordings that inform AAPI individuals about their rights and EEOC's procedures.	Year 1	Office of Communications and Legislative Affairs/Office of Research Information and Planning/Office of Information Technology (202) 663-4900	<p>a. Record audio files in all the AAPI languages we have written materials for and make those audio recordings accessible on our website.</p>

Program Goal 3: Increase litigation and enforcement efforts of employment discrimination statutes enforced by the EEOC related to issues that significantly impact AAPIs such as race and national origin discrimination.

Objective 3.1: Ensure that the Commission generates charges from the AAPI community in order to bring private sector litigation that will specifically address discriminatory workplace practices affecting the AAPI community.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Encourage Commissioners to file charges in cases that address discriminatory workplace practices which affect the AAPI community.	Year 1	Commissioner Ishimaru (202) 663-4900	a. Discuss importance of filing Commissioners' Charges with each EEOC Commissioner and District Director involving discriminatory workplace issues that impact AAPIs, such as national origin glass ceiling cases; national origin disparate pay cases; English only or English fluency cases; national origin harassment cases; and cases involving national origin and other bases such as disability and religion (for example, Muslim, Sikh, or perceived Muslim). b. Encourage District Directors to circulate potential Commissioners' Charges that impact AAPIs and other underserved communities. c. Encourage Commissioners to file charges on issues that specifically impact AAPIs.
2. Reinvigorate the priority identified in the Commission's 1996 National Enforcement Plan to bring claims of national origin discrimination involving language issues, including accent discrimination and restrictive language policies or practices.	Year 1	Office of General Counsel (202) 663-4900	a. Encourage District Offices to each file at least one case that involve one or more of the following issues: accent discrimination, national origin English only, English fluency, religious discrimination (Muslim, Sikh, or perceived Muslim). b. Encourage OGC Appellate Services to screen for and participate in national origin discrimination cases

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			involving language issues as amicus curiae.
3. Pursue discussions with other federal agencies (e.g. Department of Justice, Department of Labor) to develop partnerships to coordinate efforts in litigating cases involving AAPIs, including exploited workers, recent immigrants, working youth, and other vulnerable communities.	Year 1	Office of General Counsel/Office of Legal Counsel (202) 663-4900	a. Encourage communication with other agencies by creating liaisons to coordinate cross-agency enforcement efforts nationwide.
4. Increase AAPI charges and improve charge processing for AAPI community.	Years 1-2	Office of Field Programs/Office of Legal Counsel (202) 663-4900	a. Create training specifically geared towards EEOC investigators, attorneys, and Fair Employment Practices Agencies' staff on handling AAPI charges, including language barriers, cultural competency, Muslim or Sikh religious accommodations, and other cultural barriers unique to AAPI community. b. Conduct training nationwide, including at the national FEPA conference.

Program Goal 4: Ensure that the EEOC is an inclusive workplace at which all AAPIs can reach their full potential.

Objective 4.1: Increase the number of Asian Americans and Pacific Islanders in Senior Executive Service (SES) and supervisory management selection pools. Currently, no AAPIs serve at the SES level and no PIs hold a supervisory management position.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Conduct outreach and establish partnerships with AAPI organizations to increase the applicant pool of qualified AAPI SES candidates.	Year 1	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	a. Conduct outreach and establish 100 partnerships with AAPI community, professional, and affinity groups for assistance in identifying AAPI SES candidates. b. Review census and other data to determine where in the U.S. mainland Native Hawaiians and other Pacific Islanders are highly concentrated to identify locations other than on Hawaii and other Pacific Islands where NHOPI populations are found.
2. Increase recruitment of Asian Americans and Pacific Islanders with potential to become an SES.	Year 1	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	a. During the fiscal year, conduct two outreach/recruitment events aimed at the AAPI community, explaining the SES application process. b. Conduct additional outreach/recruitment events directed toward the AAPI community when EEOC anticipates SES vacancies.
3. Strengthen the pool of internal AAPI employees who are qualified candidates for supervisory management positions.	Year 1	Office of Equal Opportunity/Office of Human Resources /Office of the Chair (202) 663-4900	a. Develop a proposal for a program that will systematically and regularly provide detail (inside and outside of the agency) and leadership opportunities or rotational assignments for all interested mid-level employees and submit the proposal to the Chair for approval. b. Provide opportunities for individuals to obtain individual skills assessments and career development

			<p>plans.</p> <p>c. On performance plans of senior executives, managers, and supervisor performance plans, measure how they contribute to their employees' career development and promotion.</p>
4. Ensure AAPI employees have opportunities to attend training programs that build skills that enhance their abilities to become supervisors and managers.	Year 1	Office of Human Resources/Office of the Chair (202) 663-4900	<p>a. Survey all employees, including AAPI employees, at the end of the fiscal year to determine what training opportunities were provided to them and what training they chose to attend.</p> <p>b. Emphasize the importance of training opportunities to supervisors and managers.</p> <p>c. Consider all qualified individuals, including AAPIs, to serve in Acting SES positions when vacant.</p>
5. Increase leadership activities for all employees, including AAPIs.	Years 1-2	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	<p>a. Design and implement a Leadership Development Program that will identify, develop and place individuals who have high potential for becoming supervisors into leadership and management position.</p> <p>b. Develop and implement Mid-Level Skills and Management Development programs.</p> <p>c. Initiate or expand SES Candidate Development Program.</p> <p>d. Inform EEOC employees of existing SES training programs and SES vacancies within the agency.</p>

			e. Provide skills development opportunities and/or assignments for professional advancement.
6. Ensure AAPIs have mentoring opportunities to develop knowledge and skills, as well as to familiarize mentees with the SES application process and responsibilities of the SES corps.	Years 1-2	Office of Equal Opportunity (202) 663-4900	a. Recruit Asian American and Pacific Islander employees to participate in the EEOC's recently established mentoring program and ensure some are paired with supervisory or SES mentors. b. Assess affect/impact of mentoring program on career development and opportunities. c. Provide opportunities for informal mentoring such as through brown bag lunches or other contacts by managers and supervisors with AAPI employees.
7. Analyze underrepresentation and barrier causes consistent with MD-715.	Years 1-2	Office of Equal Opportunity (202) 663-4900	a. Conduct barrier and adverse impact analysis. b. Conduct an agency-wide survey to determine where possible barriers are to increasing the numbers of Asian Americans and Native Hawaiians or Pacific Islander Americans within the Commission. c. Conduct underrepresentation analyses for AAPI participation rates at the mid-level and SES levels. d. Assess AAPI underrepresentation at the mid- and senior level positions. e. Assess underrepresentation in major job occupations. f. Monitor/analyze advancement, pipeline flow and retention of AA/NHPIs. g. Analyze promotion selection rates and patterns.

Objective 4.2: Dramatically increase the number of qualified Native Hawaiians and Pacific Islanders applying for a wide variety of jobs at the EEOC, particularly to positions that have the potential to lead to supervisory positions. Currently, the Pacific Islanders working at the EEOC are only in administrative support or service worker positions.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Conduct outreach and develop partnerships with AAPI organizations to identify Native Hawaiian and Pacific Islander candidates for professional and other vacancies at the EEOC.	Year 1	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	a. Conduct outreach and develop 100 partnerships with AAPI community, professional, and affinity groups for assistance in identifying Native Hawaiian and Pacific Islander candidates for a variety of jobs.
2. Increase recruitment of Native Hawaiians and other Pacific Islanders.	Year 1	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	a. Collect and analyze applicant flow data. b. Monitor and analyze recruitment and hiring patterns/trends for PIs. c. Conduct outreach or recruitment events aimed at the Pacific Islander community, highlighting professional and other job opportunities at the EEOC and explaining the job search and application process. d. Develop recruitment events in coordination with the Office of Personnel Management and its Federal Equal Opportunity Recruitment Program.
3. Reaffirm the EEOC's commitment to having a diverse workplace with all personnel involved in recruiting and hiring.	Years 1-2	Office of the Chair/ Office of Equal Opportunity (202) 663-4900	a. Develop a fact sheet regarding the PI community (and other communities with low participation rates) and communicate these facts and MD-715 data regarding PI employees at the EEOC to all personnel involved in recruiting and hiring.
4. Invest in increasing the skills of internal EEOC PI employees so that they	Years 1-2	Office of Equal Opportunity/Office of	a. Ensure PI employees have opportunities to build skills and gain knowledge about jobs throughout the

may be competitive for other jobs in the EEOC.		Human Resources (202) 663-4900	agency. b. Conduct an informal survey of AAPI employees to determine interest in establishing an affinity or special emphasis group, and if significant interest exists, provide assistance to launch the group.
5. Develop and implement a media strategy directed at the recruitment of PI applicants.	Years 1-2	Office of Human Resources/Office of Communications and Legislative Affairs (202) 663-4900	a. Develop media strategy. b. Implement and document media strategy.
6. Enter into recruitment Memoranda of Understanding with 2-year and 4-year AAPI serving institutions.	Years 1-2	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	a. Establish MOUs with at least 50% of AANAPISIs by 2011. b. Establish MOUs with at least 75% of AANAPISIs by 2012.

Objective 4.3: Develop and include diversity and affirmative employment measures as critical elements in executive and management performance.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Hold management accountable for diversifying the workforce.	Years 1-2	Office of Equal Opportunity/Office of Human Resources/Office of the Chair (202) 663-4900	a. Attain strong policy commitment and direction for the top leadership team. b. Consider including EEO, diversity, and inclusion as critical performance elements in performance plans for all SES, managers, and supervisors by the beginning of the next SES appraisal/evaluation cycle. c. Prepare and monitor succession plans and Individual Development Plans.

			d. Require EEO, diversity, and cultural competency training for SES, managers, and supervisors.
2. Enforce anti-discrimination and equal employment opportunity laws.	Years 1-2	Office of Equal Opportunity/Office of Human Resources/Office of Federal Operations (202) 663-4900	<p>a. Analyze management's track record of complaints from an EEO perspective.</p> <p>b. Monitor and analyze complaints filed by federal employees.</p> <p>c. Monitor and analyze federal sector reports produced by OPM, EEOC, and the MSPB for general trends and patterns in the federal workforce.</p>

Objective 4.4: Increase applicant rate of AAPIS in internship and work-study programs.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Explore initiating paid internship and fellowship programs and college/university Co-Op work program.	Years 1-2	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	<p>a. Issue feasibility study on establishing paid internship, fellowship, and college/university Co-Op work programs.</p> <p>b. If feasible, develop and implement paid internship, fellowship, and/or college/university Co-Op work program.</p>
2. Create at least one internship position in the agency that will allow the intern to specifically work on AAPI issues and assist with this agency plan.	Years 1-2	Office of Equal Opportunity/Office of Human Resources (202) 663-4900	<p>a. Create position in the appropriate office.</p> <p>b. Recruit and hire intern.</p>
3. Partner with AAPI Minority Serving Institutions, as well as AAPI national and community-based groups to support summer internship programs open to all interested applicants.	Years 1-2	Office of Human Resources/Office of the Chair (202) 663-4900	<p>a. Create list of AAPI community groups.</p> <p>b. Develop outreach plan.</p> <p>c. Generate list of partnerships.</p>

Program Goal 5: Help ensure that the federal government is an inclusive workplace at which all AAPIs can reach their full potential.

Objective 5.1: Inform all federal agencies about the problems and barriers facing AAPIs in the federal workforce and instruct federal agencies on possible best practices.

Strategic Activity	Timeframe	Driver/Contact Info	Performance Outcomes
1. Issue a report summarizing findings from past MD-715 reports of problems and barriers encountered by AAPI federal workers and possible solutions.	Year 1	Office of Federal Operations, Federal Sector Programs (202) 663-4900	a. Review previous MD-715 reports submitted by federal agencies to identify major employment barriers facing Asian Americans and Pacific Islanders. b. Review previous MD-715 reports submitted by federal agencies to identify possible best practices that have removed barriers to employment for Asian Americans or Pacific Islanders. c. Issue a concise, practical guide to federal agencies so they are clearly aware of the typical problems and solutions confronting AAPI federal workers. d. Provide agencies with additional barrier analysis support, such as sophisticated data analysis